

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CRUZ VALDIVIESO FIGUERA,**  
Plaintiff,

Case No. 0:22-cv-61553-WPD

v.

**ALL VIP CARE INC., et.al,**  
Defendants.

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**MOTION FOR CONTINUANCE**

Defendants, Liz Velazquez McKinnon, by and through undersigned counsel, respectfully move this Honorable Court for a continuance of the hearing currently scheduled for **July 28, 2025 at 10:00 A.M.** before Magistrate Judge Patrick M. Hunt. As grounds for this Motion, Defendants state as follows:

**1. Procedural Posture**

This matter is currently set for hearing on **Monday, July 28, 2025 at 10:00 A.M.** in the Fort Lauderdale Division before Magistrate Judge Patrick M. Hunt for pending matter **195.** Plaintiff's Motion for Default Judgment; **201.** Plaintiff's Motion for Order to Show Cause; and **202.** Plaintiff's Motion for Writ of Execution.

**2. Grounds for Continuance**

Undersigned counsel for Defendants is presently ill and will be unable to appear at the scheduled hearing. The illness is significant enough to preclude preparation for and participation in the hearing. As such, counsel is unable to effectively represent the Defendants at the presently scheduled time.

### **3. Good Faith and Absence of Prejudice**

This request is made in good faith and not for purposes of delay. Undersigned counsel has conferred with counsel for Plaintiff in accordance with Local Rule 7.1(a)(3), and Plaintiff opposes the Continuance.

Granting this continuance will not unduly prejudice any party and will serve the interests of justice by allowing for full and fair participation by all counsel.

### **4. Relief Requested**

Defendants respectfully request that this Court enter an Order continuing the hearing currently scheduled for July 28, 2025, and rescheduling it to a later date convenient for the Court and the parties.

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### **WHEREFORE,**

Defendants respectfully request that the Court grant this Motion, continue the July 28, 2025 hearing, and grant such other and further relief as the Court deems just and proper.

Dated: July 25, 2025

**Michael Alexander Hurckes, Esq.**

Florida Bar No.: 1040918

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**CERTIFICATE OF CONFERRAL**

Pursuant to Local Rule 7.1(a)(3), undersigned counsel certifies that he/she conferred with counsel for Plaintiff regarding the relief requested in this Motion and the Plaintiff opposes the relief requested.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this July 28, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

**Michael Alexander Hurckes, Esq.**

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